

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

GILBERT MEDICAL BUILDING LLC,
and AKY MD GILBERT, LLC,

Plaintiff,

v.

TRAVELERS CASUALTY INSURANCE
COMPANY OF AMERICA,

Defendant.

Case No. 20-CV-896-R

DEFENDANT'S EXPERT DISCLOSURE [FED.R.CIV.P. 26(a)(2)]

At trial in the above-entitled matter, Defendant Travelers Casualty Insurance Company of America (“Travelers”), will utilize as an expert witness the persons listed below.

1. Steve Gray

a. This witness is a retained expert pursuant to Fed.R.Civ.P. 26 (a)(2)(B). He will testify regarding certain roofing and architectural opinions, both generally and as they apply specifically to this case. He will also testify on the subject matter of alleged hail damage to the Plaintiff's roofs and facility located in Bethany, OK. Mr. Gray will also give testimony regarding his education and experience. The substance of Mr. Gray's opinions is located in his Rule 26 report which will be provided to Plaintiffs.

2. Dr. Jason Webster

a. This witness is a retained expert pursuant to Fed.R.Civ.P. 26 (a)(2)(B). He will testify regarding certain meteorological opinions, both generally and as they apply specifically in this case. He will also testify on the subject matter of alleged hail damage to the roofs and facility located at Bethany, OK to the extent such testimony requires meteorological opinions. Dr. Webster will also give necessary testimony regarding his education and experience. The substance of Mr. Webster's opinions is located in his Rule 26 report which will be provided to Plaintiffs.

3. Anthony Milo

- a. He is a hybrid fact/expert witness pursuant to Fed.R.Civ.P. (a)(2)(C) will testify regarding his involvement in underlying insurance claim and provide limited expert opinions which were necessary to his factual investigation, analysis, and conclusions. This witness is not required to provide a written report pursuant to the Federal Rules of Civil Procedure. A summary of the substance of his testimony is as follows:
 - i. Testimony regarding the report he assisted in authoring authored in April 2020
 - ii. Opinions regarding alleged hail damage to the Plaintiff's facility;
 - iii. Factual testimony regarding his personal involvement in the underlying insurance claim and expert opinions necessary to reach his conclusions;
 - iv. Opinions regarding hail damage generally;
 - v. Opinions regarding forensic investigative hail damage assessment generally.

Respectfully submitted,

**TAYLOR, FOSTER, MALLETT, DOWNS,
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s/Jacob R. Daniel

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